

INTERVENTION



0000115316

BEFORE THE ARIZONA CORPORATION COMMISSION RECEIVED
AZ CORP COMMISSION

CARL J. KUNASEK
COMMISSIONER-CHAIRMAN
JIM IRVIN
COMMISSIONER
RENZ JENNINGS
COMMISSIONER

JUN 17 2 16 PM '99

DOCUMENT CONTROL

IN THE MATTER OF THE STRANDED COST)
FILING AND REQUEST FOR A WAIVER)
OF CERTAIN PORTIONS OF THE RULES)
FILED BY TRICO ELECTRIC COOPERATIVE,)
INC.)

DOCKET NO. E-01461A-98-0466

IN THE MATTER OF THE FILING BY TRICO)
ELECTRIC COOPERATIVE, INC. OF)
UNBUNDLED AND STANDARD OFFER)
SERVICE TARIFFS PURSUANT TO A.A.C.)
R14-2-1606)

DOCKET NO. E-01461A-97-0696

COMMONWEALTH'S APPLICATION FOR LEAVE TO INTERVENE

Commonwealth Energy Corporation ("Commonwealth"), through undersigned counsel, and pursuant to A.A.C. Rule 14-3-105, moves to intervene in the matter captioned above. In support of this Motion, Commonwealth states as follows:

1. Commonwealth is a California corporation active in the marketing of competitive electric services in California and desires to market competitive electric services in Arizona.

2. Commonwealth has intervened in the Arizona Electric Competition proceeding, Docket No. RE-00000C-94-0165.


3. Commonwealth will be directly and substantially affected by the decisions made in this proceeding because Commonwealth anticipates becoming an electric service provider in Arizona.

4. Commonwealth has invested considerable time and resources in the development of the California electric marketplace and it desires to sell similar competitive electric services in Arizona. Therefore, Commonwealth has a vested interest as to how electric service providers are treated under the Electric Competition Rules and in the ability of electric service providers to compete in Arizona.

1 For the reasons presented, Commonwealth respectfully requests that this Motion to
2 Intervene be granted.

3 RESPECTFULLY submitted this 17th day of June, 1999.

4 DOUGLAS C. NELSON, P.C.

6 

7 Douglas C. Nelson, Esq.
8 7000 North 16th Street, #120-307
9 Phoenix, Arizona 85020
Attorney on behalf of Commonwealth Energy Corporation

10 **ORIGINAL and ten copies** of the foregoing
11 filed this 17th day of June, 1999 to:

12 Docket Control
13 ARIZONA CORPORATION COMMISSION
1200 West Washington Street
13 Phoenix, Arizona 85007

14 **COPIES** of the foregoing hand-delivered
15 this 17th day of June, 1999 to:

16 Jerry Rudibaugh, Chief Hearing Officer
17 Arizona Corporation Commission
1200 West Washington Street
17 Phoenix, Arizona 85007

18 Paul Bullis
19 Janice Alward
20 Chief Counsel - Legal Division
21 ARIZONA CORPORATION COMMISSION
1200 West Washington
20 Phoenix, Arizona 85007

22 Ray Williamson, Acting Director
23 Utilities Division
24 ARIZONA CORPORATION COMMISSION
1200 West Washington
24 Phoenix, Arizona 85007

1 **COPIES** of the foregoing mailed
2 this 17th day of June, 1999 to:

3 Russell E. Jones
4 D. Michael Mandig
5 O'Connor Cavanagh Molloy Jones
6 33 North Stone Avenue, Suite 2100
7 Tucson, Arizona 85701-3591
8 Attorneys for Trico Electric Cooperatives, Inc.

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

By Venus Green

c:\Commonwealth\Pleadings\Trico.interven